

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
ST. JOSEPH DIVISION**

STACY ARNOLD,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Case No. 19-06137-CV-SJ-BP
CITY OF ST. JOSEPH,	)	
ST. JOSEPH PUBLIC LIBRARY,	)	
OFFICER REBECCA HAILEY (IN HER	)	
PERSONAL AND PROFESSIONAL CAPACITY)	)	
AND ROGER CLARY	)	
	)	
	)	
Defendants	)	

**UNOPPOSED MOTION TO EXCEED THE PAGE LIMITATION**

COMES NOW, Plaintiff Stacy Arnold, and respectfully moves this Court to grant Plaintiff permission to exceed the page limitation in her suggestions supporting her motion for summary judgment. Plaintiff requests leave to file thirty-one (31) total pages of argument. In support of this motion, Plaintiff states as follows:

1. In accordance with Local Rule 7(d)(1)(A), supporting suggestions may not exceed fifteen (15) pages in length unless the Court orders otherwise.
2. Plaintiff has made efforts to make her argument as concise as possible, but due to interpretive challenges regarding the issue at hand (forum analysis), to include different interpretative possibilities regarding the nature of the forum and the necessity of reconciling different judicial opinions, Plaintiff is unable to effectively communicate her argument without exceeding the page limit. See Henderson v. Lujan, 964 F.2d 1179,1186 (D.C. Cir. 1992)

(Williams, C.J., concurring) (commenting that “here the main role of ‘forum’ analysis has been to extend the briefs, as both parties (necessarily) addressed the sidewalks' characteristics both in the forum analysis and then in assessment of the ban; in addition, both briefs made that assessment under two assumptions, the existence and the non-existence of a public forum.)

3. Plaintiff has organized her suggestions to the best of her ability, and has included a table of contents, a table of authorities, and statements of fact.

4. Plaintiff’s suggestions do not contain superfluous ideas or language.

5. Plaintiff has conferred with counsel for Defendant St. Joseph Public Library, as well as counsel for Defendant City of St. Joseph and Rebecca Hailey. Counsel for all parties have indicated that they will not oppose this motion.

6. This motion is made in the interests of Justice and in good faith.

**WHEREFORE**, Plaintiff respectfully requests leave to exceed the page limitation in her suggestions supporting her motion for summary judgment by a total of sixteen (16) pages, to result in thirty-one (31) total pages of argument.

Respectfully Submitted,

STACY ARNOLD, Plaintiff

/s/Stacy Arnold  
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### **CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing was filed electronically with the Clerk of the Court on October 9, 2020, to be served by operation of the Court's electronic filing system upon:

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/s/ Stacy Arnold